

REMARKS

Claims 1-9, 11-14, 16-32, 34 and 35 were rejected by the Examiner. Claims 1, 23, and 27 have been amended. Claims 7, 12-14, 16-22, 32, and 34-35 have been cancelled (claims 10, 15, 33, and 36-37 were cancelled in the previous response). No new matter has been introduced. Reconsideration of the application is respectfully requested.

CLAIM REJECTIONS UNDER 35 U.S.C. § 112

In “Claim Rejections – 35 USC § 112” on page 5 of the above-identified Final Office Action, claims 1 and 27 have been rejected under 35 USC § 112, para 1. In particular, the Examiner stated that claims 1 and 27 are not enabled since it is unclear how “receiving network traffic from the second device corresponding to a previous secure communication session established when the second device was previously on the internal network” can take place when the second device moves to the external network while still using the IP address belongs to the internal network.

Applicants respectfully submit that such feature in claims 1 and 27 are sufficiently enabled by the specification, for example paragraph [0038] discloses “the control point is using a global address, FQDN, or the like to address network traffic for the desired device, this traffic will now route to the gateway and appear on its ‘external WAN’ side.”

Withdrawal of the rejection is respectfully requested.

CLAIM REJECTIONS UNDER 35 U.S.C. § 103

In “Claim Rejections – 35 USC § 103” item 3 on page 4 of the above-identified Final Office Action, claims 1-7, 9, 11, 23-25, and 27-31 were rejected as being unpatentable over U.S. Patent Application Publication No. 2003/0217136 (hereinafter Cho), in view of U.S. Patent Application Publication No. 2002/0103898 (hereinafter Moyer) under 35 U.S.C. § 103(a).

First of all, on page 4 of the Final Office Action, the Examiner stated that the previously presented claim 1 simply recites an “receiving” rather than a “determining” operation regarding the network traffic from the second device. The Examiner therefore assumed that the arguments presented in the last response is not applicable to the previously presented claim 1. In response,

claim 1 is amended to recite "...determining whether network traffic from the second device is corresponding to a previous secure communication session established when the second device was previously on the internal network..." Applicants respectfully re-submit that Cho fails to teach or suggest such a feature in claim 1.

According to paragraph [0026], Cho discloses a proxy system for a home gateway designed to allow a user to control UPnP devices in a home network over an external Internet network using a wired/wireless Internet client. In the Final Office Action, the Examiner read the UPnP proxy server in Cho as the intermediary in claim 1. The UPnP proxy server in Cho includes an agent for receiving commands from the internet clients, and a bridge for sending control messages to the UPnP devices on the home network. Figures 3 of Cho is the operating flowchart of the agent and Figure 5 of Cho is the operating flow chart of the bridge. As illustrated in Figure 3 of Cho, the agent only determines that if the message is a web page request message or a device control message. As illustrated in Figure 5 of Cho, the bridge only determines that whether the message is from the agent or from the UPnP device, and whether the message is a device control command or a event registration message. None of the figures disclose that the UPnP proxy in Cho would determine as in claim 1 that whether the messages belong to a communication session previously established between the UPnP device on the home network and another device that roamed out from the home network.

Thus, Applicants submit that Cho fails to teach or suggest the "determining" operation in amended claim 1.

Second, still On page 4 of the Final Office Action, the Examiner stated that generating an error in response to messages no longer considered valid is a common knowledge well within one of ordinary skill in the art of computer/communications network. The Examiner indicated in such a statement that there would be a determination of the validity of messages from a device moves out of a home network and it is commonly known that when a device moves out of a home network, the address of the device would be no longer valid with respect to the home network, therefore messages from the device would be deemed as invalid.

Besides the above quoated feature, amended claim 1 also recites that "... the second device uses an address that is globally routable on the internal and the external networks and therefore the network traffic is valid with respect to the internal network..." In contrast to the

common knowledge, the network traffic in claim 1 is still valid when the second device moves out of the internal network. Instead of validity, the determining operation in claim 1 is conducted based on whether network traffic from the second device is corresponding to a previous secure communication session established when the second device was previously on the internal network. Also, neither the common knowledge nor any of the references cited in the Final Office Action teaches or suggests that a device moves out of the home network would use a globally routable address.

Accordingly, Applicants submit common knowledge fails to teach or suggest at least above element of amended claim 1.

Moyer which was cited as teaching the filter rules in claim 1 cannot cure the deficiency of Cho or common knowledge. Thus, Applicants respectfully submit that Cho, common knowledge and Moyer fail teach or suggest each and every element of amended claim 1 and therefore fail to establish a *prima facie* case of amended claim 1. Thus, Applicants respectfully submit that claim 1 is patentable over Cho, common knowledge, and Moyer, alone or combined, under 35 U.S.C. § 103(a).

Claims 23 and 27 recite in general similar subject matter to claim 1. Claims 2-7, 9, 11, 24-25, and 28-31 depend from claims 1, 23 or 27 respectively, incorporating their recitations. Therefore, due to at least above stated reasons, claims 2-7, 9, 11, 23-25, and 27-31 are patentable over Cho, common knowledge, and Moyer, alone or combined, under 35 U.S.C. § 103(a).

2. In “Claim Rejections – 35 USC § 103” on page 16 of the above-identified Final Office Action, claims 12-14, 16-20, 22, 32, and 34-35 were rejected as being unpatentable over Cho, IETF draft “Simple Service Discovery Protocol/1.0” (hereinafter IETF-Draft-SSDP), and Moyer under 35 U.S.C. § 103(a).

Claims 12-14, 16-20, 22, 32, and 34-35 have been cancelled, which renders their rejections moot.

3. In “Claim Rejections – 35 USC § 103” on page 22 of the above-identified Final Office Action, claim 8 was rejected as being unpatentable over Cho, Moyer and in view of U.S. Patent Application Publication No. 2005/0111382 (hereinafter Le) under 35 U.S.C. § 103(a).

Claim 8 depends from amended claim 1, incorporating its recitations. Le is cited to read on communication within the internal network is accord with an IPv6 compatible Internet protocol in claim 8. However, Le fails to cure the deficiency of Cho and Moyer. Therefore, due to at least one of the reasons above in section 1, claim 8 is patentable over Cho, Moyer and Le under 35 U.S.C. § 103(a).

4. In “Claim Rejections – 35 USC § 103” on page 23 of the above-identified Final Office Action, claim 21 was rejected as being unpatentable over Cho, IETF-Draft-SSDP, Moyer and IETF RFC 3056, “Connection of IPv6 domains via IPv4 clouds” (hereinafter RFC 3056) under 35 U.S.C. § 103(a).

Claim 21 has been cancelled, which renders its rejection moot.

5. In “Claim Rejections – 35 USC § 103” on page 23 of the above-identified Final Office Action, claim 26 was rejected as being unpatentable over Cho, Moyer and “UPnP™ Security Ceremonies Design Document 1.0” authored by Ellison and published by the UPnP Forum (hereinafter Ellison) under 35 U.S.C. § 103(a).

Claim 26 depends from claim 23, incorporating its recitations. Ellison was cited to read on the secure communication initiation request corresponds to a UPnP Set Session Key (SSK) request in claim 26. However, Ellison fails to cure the deficiency of Cho and Moyer. Thus, based on at least one of the reasons stated above in section 1, claim 26 is patentable over Cho, Moyer and Ellison under 35 U.S.C. § 103(a).

CONCLUSION

In view of the foregoing, Applicant respectfully submits that all pending claims are in condition for allowance. Early issuance of the Notice of Allowance is respectfully requested.

Please charge any shortages and credit any overages to Deposit Account No. 500393.

Respectfully submitted,
SCHWABE, WILLIAMSON & WYATT, P.C.

Dated: 06/30/2009

/Al AuYeung/
Al AuYeung
Reg. No. 35,432

Schwabe, Williamson & Wyatt, P.C.
Pacwest Center, Suites 1600-2000
1211 SW Fifth Avenue
Portland, Oregon 97204
Telephone: 503-222-9981